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December 3, 2019

VIA ECF

Honorable Joseph A. Dickson, U.S.M.J.
U.S. District Court for the District of New Jersey
Martin Luther King Jr. Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07102

Re: *White, et al. v. Samsung Electronics America, Inc., et al.*, No. 17-1775 (MCA)(JAD)
Telephone Conference on Wednesday December 4, 2019

Dear Judge Dickson:

On behalf of all parties in the above-referenced matter, we submit this Joint Letter concerning the telephone conference scheduled with Your Honor on Wednesday December 4, 2019.

Briefly, on Monday December 2, 2019, the Court entered the Parties' Proposed Stipulation and Consent Order which extended the discovery stay order previously entered in this matter and the time within which Defendants must answer or otherwise respond to the Second Amended Complaint. The discovery stay will remain (1) for a period of 90 days up to and including March 5, 2020; or (2) if the Court issues its decision on the pending motions for reconsideration or certification for interlocutory appeal before March 5, 2020, for a period of 30 days after the Court issues its decision.

The status conference was scheduled before entry of the aforementioned Stipulation and Consent Order but in view of the Order, the Parties do not believe a status conference is necessary at this time. Of course, should your Honor wish to proceed with the conference, all parties will be available.

Thank you for your kind consideration and please do not hesitate to contact me should there be any questions.

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Respectfully submitted,

s/ Michael R. McDonald
Michael R. McDonald

Enclosure

cc: All Counsel of Record (via ECF)